



State of Wisconsin  
Governor Scott Walker

TO: **Income Maintenance Supervisors  
Income Maintenance Lead Workers  
Income Maintenance Staff  
Training Staff  
Child Care Coordinators**

FROM: Junior Martin, Acting Director  
Bureau of Program Integrity  
Division of Early Care and Education  
Department of Children and Families

**DECE/BPI OPERATIONS MEMO**

No: 17-12

DATE: 2/27/2017

Child Care

**SUBJECT: Procedure for Compromised MyWICChildCare EBT Cards and  
Confiscation**

**EFFECTIVE DATE: FEBRUARY 27, 2017**

**PURPOSE**

This Operations Memo introduces instructions for local agency staff on how to confiscate client MyWICChildCare EBT cards from child care provider(s) or other unauthorized individuals.

**BACKGROUND**

It is against MyWICChildCare policy for parents to give and/or share their MyWICChildCare EBT cards and/or Personal Identification Number (PIN) information with any individual including their provider. If a referral is submitted to the Department and/or local agency stating that a provider is in possession of this information, the Department and/or local agency must follow the procedures outlined below.

**Confiscation of Cards Procedure for LOCAL AGENCIES:**

**STEP 1: The Referral**

Once a report or referral is received indicating that a provider or unauthorized individual may be in possession of client MyWICChildCare EBT card(s), account number(s), PIN(s), authorization notices, and/or any representation of these items, immediate action must be taken including confiscating the EBT card(s) or making a referral to the Child Care Fraud Mailbox.

*Note: This procedure also applies to any individual who may be in the field conducting a provider visit. If the individual believes or knows that the provider is in possession of these items, the procedure below applies.*

*Note: If an individual is not under contract with the Department (such as YoungStar Technical Consultants) and becomes aware of a possible inappropriate possession of MyWICildCare Cards or information, please submit a referral to the Child Care Fraud Mailbox at: [DCFMBchildcarefraud@wisconsin.gov](mailto:DCFMBchildcarefraud@wisconsin.gov) in lieu of the procedure established in this Operations Memo.*

### *STEP 2: Preparing for the Visit*

The local agency must identify a local agency staff member that will be responsible for collecting the card(s) and/or card information. The local agency individual may be anyone who has access to visit a provider location, including: local agency staff, investigator, licensor, certifier, etc. The local agency will identify who has the authority to collect the cards or card information from the facility. Physical removal of the cards and/or card information must be scheduled within **48 hours** of receipt of the referral.

The items to be collected during the visit may include: the client's MyWICildCare cards, documents with account numbers and/or PINs, authorization notices, or any representation of this information, such as photocopies.

Prepare to bring:

- Removal of Records Receipt(s) ([DCF-F-2630](#)) for any documents/items collected;
- Business cards;
- List of interview questions to ask the provider (see below for recommended questions).

### *STEP 3: The Confiscation of Cards Visit*

The Bureau of Program Integrity (BPI) recommends the following actions when conducting a site visit (additional guidance is provided in [4.10.1.1](#)):

- Upon arrival, provide identification and indicate the purpose of the visit
- Assess the daily attendance records for that day/week
  - Record collection of daily attendance records can be requested
- Disengage and depart if the situation is unsafe or if the provider becomes hostile and there are no means to de-escalate the situation
- Interview the provider:
  - Optional: Voice record the visit (this may be done with or without notice to the recorded parties, see Wisc. Stat. [968.29](#));
  - Ask the provider to surrender the MyWICildCare cards/account numbers/PINs/ copies of these items that they have in their possession;
  - Questions that should be asked include:
    - What is your payment policy for private pay parents? For Wisconsin Shares parents?
    - Are you aware of the policy regarding MyWICildCare cards and payments issued by that card?
    - How did you come into possession of the MyWICildCare Card/Account Number/PIN/Authorization Notice/representation of these items for [Insert Client Name]?

The BPI is available for any necessary coaching at the request of the local agency for assistance with this process.

*STEP 4: After the Confiscation of Cards Visit*

Once the site visit is complete, the agency worker must:

1. Complete an Incident Report ([DCF-F-5179-E](#)) documenting the visit thoroughly and highlighting the encounter, timeframe, and parties present. This should be completed within **24 hours** of the visit.
2. Contact the Bureau of Program Integrity (BPI) via the Fraud Mailbox ([DCFMBchildcarefraud@wisconsin.gov](mailto:DCFMBchildcarefraud@wisconsin.gov)) within **48 hours** of the visit. Submit the following information to the fraud mailbox:
  - a. A summary email titled ("Card Confiscation: Provider [Insert Number]") that indicates:
    - i. Name of the licensee of the provider location investigated
    - ii. Facility name
    - iii. Provider number and location number
    - iv. Number of client cards or card information collected
    - v. Name of the primary person for each item collected
    - vi. Client case(s) for the items collected
    - vii. Incident Report of the confiscation visit
    - viii. Scanned copies of the evidence gathered (cards, etc.)
    - ix. Indication of whether the visit was voice recorded. If it was, please include a copy of the voice recording.

The email to BPI will trigger a submission of the card information to the EBT card vendor (Fidelity Information Services (FIS)) for deactivation or PIN reset. All confiscated cards or information linked to cards will result in card deactivation. BPI will inform the vendor of the compromise, ask the vendor to deactivate the cards, and request new cards to be mailed to the impacted client(s). Typically, new cards will arrive within five (5) to seven (7) business days.

Any authorizations to the provider that did not have their cards confiscated will have their PINs reset, if it is suspected that the provider may have had access to the client's cards. This information will be gathered by BPI and also submitted to FIS. A PIN Compromised Letter ([DCF-F-5181-E](#)) must be issued to all of the impacted individuals the same day that the PINs are reset (see the procedure outlined below).

BPI will confirm with the agency via email once the cards have been deactivated and PINs reset. At this point, the local agency should:

1. Send a copy of the MyWIChildCare EBT Card Deactivation Notice to all impacted clients ([DCF-F-5180-E](#)). The notice informs the client that their MyWIChildCare Card has been compromised, reviews Wisconsin Shares policy, and informs them that their previous card has been deactivated, and a new card will be generated.

- a. This letter should be **mailed the same day** that the BPI notifies the agency that the card(s) have been deactivated.
  - b. The card deactivation situation and information should be documented in EBT CSAW comments.
  - c. A copy of this letter should be loaded into Electronic Case Files (ECF).
  - d. Any physical evidence gathered that is in paper form (such as a photocopy), should be scanned and saved for future investigative reference, then this information may be shredded. Photocopies of confiscated cards should also be made and stored in the ECF. Destroy (i.e. shred) any physical cards that were obtained during the visit.
2. Send a copy of the PIN Compromised Letter ([DCF-F-5181-E](#)) to all clients identified by BPI that attend the provider's facility that did not receive a Deactivation Notice. This letter notifies the client that their MyWICChildCare Card PIN may have been compromised, reviews Wisconsin Shares policy with the client, and informs them that their PIN has been reset, and outlines instructions for how to select a new PIN.
  - a. This letter should be **mailed the same day** that the BPI notifies the agency that the PIN(s) have been reset.
  - b. The PIN reset situation and information should be documented in EBT CSAW case comments.
  - c. A copy of the PIN Compromised letter should be loaded into the ECF.

#### *STEP 5: Recommendation*

Following the deactivation of the cards, BPI will assess the case information supplied by the local agency to determine next steps. BPI may conduct client interviews in order to assist in the determination of intent.

Once the review of the case is complete, BPI will submit a recommendation on how to proceed with the investigation to the local agency. The recommendation will be based on the determination if there was intent to violate policy for malicious purposes or if the provider has a history of violations.

Possible recommendation outcomes may include: technical assistance for the provider and/or clients, or formal investigation.

1. If technical assistance is recommended, BPI will issue the technical assistance to the provider.
2. If a formal investigation is requested, it may be conducted by local agencies that have the resources to do so. BPI will support and/or lead an investigation depending on local agency resources and determination by the Department. If discovered that the client already has a history of giving their card to a provider, reporting cards as lost or stolen, or if card has been replaced more than four (4) times, the BPI will lead an investigation for possible fraud and intentional violations.

**STEP 6: BRITS Client Referral Entry**

All parents whose MyWICildCare cards or card information was collected from the provider will have BRITS referral(s) created to track potential fraudulent trends. Any related client referrals will be created by BPI. If a client investigation is conducted for an individual in relation to the provider investigation, it should be documented in BRITS. Any paper copies of the confiscated information may also be loaded to the BRITS referrals.

**Confiscation of Cards Procedure for DEPARTMENT STAFF:**

The procedure supplied in this section is for staff of the Department of Children and Families, such as (but not limited to): BPI, and Bureau of Early Care and Regulation Licensors and Certifiers.

These individuals frequently visit provider locations and have a potential higher opportunity for witnessing inappropriate MyWICildCare card possession. For staff that are at a provider's location and become aware and/or suspicious of a provider being in possession of MyWICildCare EBT Cards (a picture of the card is provided below), Account Numbers, Authorization Notices, client PINs, and/or any representation of these items, please follow the procedure outlined below.



**STEP 1:** Ask the provider whether they are in possession of any client's MyWICildCare EBT cards. If they say yes:

- Let them know that you must collect all of the items during the visit.
- Ask them whether they are aware of the policy regarding MyWICildCare cards and payments issued by that card; and how they came into possession of the MyWICildCare Card/Account Number/PIN/representation of these items.

If the provider indicates that they are not in possession of a card despite what has been witnessed, submit an email to BPI ([DCFMBCHILDCAREFRAUD@wisconsin.gov](mailto:DCFMBCHILDCAREFRAUD@wisconsin.gov)) containing your concerns, a description of visit, and the pertinent provider information (see Step 2 for a list of what qualifies as pertinent provider information) within 24 hours of the visit.

**STEP 2:** When able, send an email to BPI at [DCFMBCHILDCAREFRAUD@wisconsin.gov](mailto:DCFMBCHILDCAREFRAUD@wisconsin.gov) including the following information. This must be completed within **24 hours** of the visit:

1. A summary email titled ("Card Confiscation: Provider [Insert Number]") that indicates:
  - a. Name of the licensee of the provider location investigated
  - b. Facility name

- c. Provider number and location number
- d. Number of client cards or card information collected (or seen)
- e. Name of the primary person for each item collected (if applicable)
- f. Client case(s) for the items collected (if applicable)
- g. Program Integrity Incident Report ([DCF-F-5179-E](#)) of the confiscation visit
- h. Scanned copies of the evidence gathered (cards, etc.) (if applicable)
- i. Indication of whether the visit was voice recorded. If it was, please include a copy of the voice recording.

When this information is received, BPI will:

- Process the referral and determine whether the local agency or BPI will conduct the investigation;
- Send the information to FIS for deactivation;
- Produce Deactivation Notices ([DCF-F-5180-E](#)) and PIN Compromised Letters ([DCF-F-5181-E](#)) for impacted individuals; and
- BPI will contact the individual who sent the email with further instructions.

## **CONTACTS**

For referrals regarding alleged fraud or other program integrity concerns, please submit a referral to the Child Care Fraud Mailbox at [DCFMBCHILDCAREFRAUD@wisconsin.gov](mailto:DCFMBCHILDCAREFRAUD@wisconsin.gov).

For any questions surrounding this Operations Memo or Chapters 3 and 4 of the Wisconsin Shares Policy Manual, please contact the Bureau of Program Integrity (BPI) at [DCFBPITArequest@wisconsin.gov](mailto:DCFBPITArequest@wisconsin.gov).

For Wisconsin Shares Child Care policy questions outside of Milwaukee County contact your Bureau of Regional Operations (BRO), Child Care Coordinators at <https://dcf.wisconsin.gov/files/regionaloperations/pdf/contactlist.pdf>

For Child Care CARES/CWW, CSAW and CCPI Processing Questions statewide and policy questions in Milwaukee County contact the Child Care Subsidy and Technical Assistance Line at: [childcare@wisconsin.gov](mailto:childcare@wisconsin.gov) or (608) 422-7200.

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